



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 15, 2015

MR. JAMES P. HODGINS, TREASURER
FOUNDATION FOR A GREATER AMERICA
INC
P.O. BOX 3587
TUSTIN, CA 92781

Response Due Date
12/21/2015

IDENTIFICATION NUMBER: C00555862

REFERENCE: MID-YEAR REPORT (01/01/2015 - 06/30/2015)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 4 item(s):

1. Your report discloses a payment(s) on Schedule A from "CrossClick Media, Inc.(CCM2)" and "Judson A Church" that has not been recorded on Schedule C. Loan payments must also be reflected on Schedule C. Please amend your report to clarify this discrepancy. (52 U.S.C. §30104(b)(4) (formerly 2 U.S.C. §434(b)(4)))
2. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the attached description(s). For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

3. Your report discloses a loan owed by "(2) Finiks Capital, LLC" with an outstanding beginning balance of \$43,305.84 The previous report filed by your committee discloses a closing balance of \$43,813.34. These amounts should be the same. Please correct this discrepancy and file an amendment to your

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report(s). (52 U.S.C. §30104(b) (formerly 2 U.S.C. §434(b)(8)) and 11 CFR §104.11)

4. Your report discloses a loan repayment on Schedule C from ("2) Finiks Capital, LLC " which has not been recorded on Schedule A. Loans and loan repayments received must be reflected on Schedule A as well as on Schedule C. Please amend your report to clarify this discrepancy. (52 U.S.C. §30104(b)(3)(E) and (5)(D) (formerly 2 U.S.C. §434(b)(3)(E) and (5)(D)))

- Schedule B of your report discloses an expenditure(s) for "bot stamps at us bank for mailing pledge letters for Hillary campaign," "bot stamps at us bk for v4h campaign," "bot stamps for v4h campaign," "bot stamps from ATM for mailing for v4h campaign," "stamp purchase for pledge letters for votersforhillary.com." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1164.

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Sincerely,

A handwritten signature in black ink that reads "Nicole Miller". The script is cursive and fluid, with the first name "Nicole" and last name "Miller" clearly distinguishable.

Nicole Miller
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

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Failure to Properly Itemize Disbursements
Foundation for a Greater America INC (C00555862)

Inadequate Purposes

Name	Date	Amount	Purpose
CrossClick Media, Inc.(CCM2)	4/24/15	\$2,800.00	partial paydown of debt
CrossClick Media, Inc.(CCM2)	4/28/15	\$2,900.00	partial debt repayment
CrossClick Media, Inc.(CCM2)	4/28/15	\$17,000.00	partial debt repayment
CrossClick Media, Inc.(CCM2)	4/29/15	\$3,000.00	partial debt repay
CrossClick Media, Inc.(CCM2)	5/4/15	\$2,150.00	partial repay of debt
CrossClick Media, Inc.(CCM2)	5/6/15	\$700.00	partial debt repay
CrossClick Media, Inc.(CCM2)	5/7/15	\$1,275.00	partial repay of debt
CrossClick Media, Inc.(CCM2)	5/7/15	\$450.00	partial debt repay
CrossClick Media, Inc.(CCM2)	5/29/15	\$700.00	partial debt repay
CrossClick Media, Inc.(CCM2)	6/11/15	\$275.00	partial pay on debt to CCM
CrossClick Media, Inc.(CCM2)	6/11/15	\$725.00	partial pay on debt to CCM
CrossClick Media, Inc.(CCM2)	6/12/15	\$450.00	partial pay on debt to CCM
CrossClick Media, Inc.(CCM2)	6/24/15	\$675.00	partial pay on debt to CCM
CrossClick Media, Inc.(CCM2)	6/26/15	\$110.00	partial paydown on debt to CCM
CrossClick Media, Inc.(CCM2)	4/24/15	\$760.00	payment versus acct invoices / 'owed by committee'
CrossClick Media, Inc.(CCM2)	1/29/15	\$2,500.00	paid on account - orig bal \$39,839.38
CrossClick Media, Inc.(CCM2)	1/30/15	\$1,000.00	partial repayment of debt - orig bal of \$39,839.38
CrossClick Media, Inc.(CCM2)	1/30/15	\$2,650.00	partial paid on account - orig bal \$39,839.38
CrossClick Media, Inc.(CCM2)	1/30/15	\$1,900.00	partial paid on acct - orig balance \$39,839.38
CrossClick Media, Inc.(CCM2)	1/30/15	\$1,000.00	partial pay on acct - orig balance \$39,839.38
CrossClick Media, Inc.(CCM2)	2/2/15	\$2,700.00	partial repayment of debt - orig bal of \$39,839.38
CrossClick Media, Inc.(CCM2)	2/2/15	\$7,900.00	partial repayment of debt - orig bal of \$39,839.38
CrossClick Media, Inc.(CCM2)	2/2/15	\$500.00	partial repayment of debt - orig bal of \$39,839.38
CrossClick Media, Inc.(CCM2)	4/2/15	\$160.00	partial repayment of debt for services
CSC - Corporation Service Company	5/14/15	\$200.00	partial repayment of debt owed by committee